

COHN, LIFLAND, PEARLMAN,  
HERRMANN & KNOPF LLP  
PETER S. PEARLMAN  
Park 80 West-Plaza One  
250 Pehle Avenue  
Suite 401  
Saddle Brook, NJ 07663  
Telephone: 201/845-9600  
201/845-9423 (fax)

Co-Lead Counsel for Plaintiffs

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

In re JOHNSON & JOHNSON	)	No. 3:10-cv-02033-FLW-DEA
DERIVATIVE LITIGATION	)	
_____	)	ROBBINS GELLER RUDMAN &
This Document Relates To:	)	DOWD LLP'S RESPONSE TO THE
	)	REPORT AND RECOMMENDATION
ALL ACTIONS.	)	OF SPECIAL MASTER
_____	)	

Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) respectfully submits this response to the Report and Recommendation of Special Master (“Recommendation”) (Dkt. No. 234). We have reviewed the entire 138 page report as well as the appendices. We appreciate the Special Master’s acknowledgement that the District Court found that the settlement provided a substantial benefit to the nominal party Johnson & Johnson & Company, and that our firm, in conjunction with co-counsel, invested significant time and resources into achieving this result. *See* Recommendation at 8. However, as to a number of matters, Robbins Geller disagrees with the Special Master’s analysis of and conclusions regarding the manner in which the plaintiffs’ counsel in general, and Robbins Geller in particular, prosecuted the case. This notwithstanding, however, in the interest of judicial economy Robbins Geller does not challenge the recommended lodestar.<sup>1</sup>

DATED: July 8, 2013

Respectfully submitted,

COHN, LIFLAND, PEARLMAN,  
HERRMANN & KNOPF LLP  
PETER S. PEARLMAN

s/ Peter S. Pearlman  
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PETER S. PEARLMAN

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<sup>1</sup> Robbins Geller does, however, object to the Objection of Mark G. Petri to Special Master Report, dated July, 3, 2013. Dkt. No. 242.

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250 Pehle Avenue  
Suite 401  
Saddle Brook, NJ 07663  
Telephone: 201/845-9600  
201/845-9423 (fax)

ROBBINS GELLER RUDMAN  
& DOWD LLP  
TRAVIS E. DOWNS III  
DAVID W. MITCHELL  
DARRYL J. ALVARADO  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

Co-Lead Counsel for Plaintiffs